

REMARKS

The Office Action of 10/16/2007 has been carefully considered. Reconsideration in view of the foregoing amendments and the present remarks is respectfully requested.

Claims 16 has been canceled. Claim 15 has been amended to depend from claim 1. Claims 19 and 26 have been amended in view of the Examiner's remarks and are now believed to be definite.

Claims 1-5, 9-14, 17-20 and 24-26 were rejected as being unpatentable over Norman in view of Margo. Claims 6-8 and 21-23 were rejected as being unpatentable over the same base combination further in view of Ream. These rejections are traversed and reconsideration respectfully requested.

It would not have been obvious to combine the teachings of the references in the manner argued to arrive at the present invention, for the following reasons.

The apparatus of Norman uses flash memory to emulate a disk drive and is therefore block oriented. A block of data to be written is compared to the corresponding stored data to determine whether the new block of data is indeed different than the old block of data so as to require writing the new block of data.

The apparatus of Margo is much different.

The apparatus of Margo is uniquely related to the AMD microprocessor addressing scheme that uses four byte enable signals as the least significant address bits. Depending on the address enable signals, an address may signify a one, two, three or four-byte quantity. The entire idea of Margo centers on the concept of related addresses,

i.e., addresses that differ, if at all, only in the value of the byte-enable signals BE0-3. A four-byte-wide FIFO is provided between a data producer and a data consumer, and a write merge (or write collapse) operation is provided. For example, if a data location holds data corresponding to an address with BE0 and BE1 enabled and BE2 and BE3 disabled, and a write is performed of data having a related address but with BE0 and BE1 disabled and BE2 and BE3 enabled, the write is performed such that both data values share the same four-byte-wide FIFO location.

There is no justification for generalizing Margo beyond its ordinary scope. Margo says nothing about block oriented processing as in Norman. And there is no need for anything like the apparatus of Margo in Norman.

Accordingly, the proposed combination is unportable.

Withdrawal of the rejections and allowance of claims 1-15 and 17-26 is respectfully requested.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "M. Ure", is written over a horizontal line.

Michael J. Ure, Reg. 33,089

Dated: 1/16/2008